

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

Chapter 7

Case No.: 24-41955 (ESS)

Hui Qin,

Debtor.

Honorable Elizabeth S. Stong

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NOTICE OF MOTION TO WITHDRAW CHAPTER 7 PETITION

PLEASE TAKE NOTICE, that upon the annexed application of the debtor Hui Qin, will move this Court before the Honorable Elizabeth S. Strong, Bankruptcy Judge of the United States Bankruptcy Court at a telephonic hearing to be held at the United States Bankruptcy Court, 271 Cadman Plaza East, Courtroom 3585, Brooklyn, New York 11201 on March 4, 2025 at 12:30 am of that day, or as soon thereafter as counsel can be heard, for an Order withdrawing the debtor's Chapter 7 petition.

PLEASE TAKE FURTHER NOTICE that effective March 14, 2022, all hearing participants must register with eCourt Appearances two days in advance of all appearances. Registration is required by both attorneys and non-attorneys. If you have a CM/ECF account, you may access eCourt Appearances in the "Utilities" menu after logging into CM/ECF. If you do not have a CM/ECF account, you may access eCourt Appearances on the Court's website at: <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that those unable to access eCourt Appearances must email Judge Elizabeth S. Stong's Courtroom deputy for instructions at (347) 394-1864, ess_hearings@nyeb.uscourts.gov, at least two (2) business days prior to the hearing date.



You email must include your name, the case number(s), who you represent (if you are an attorney), hearing date, and phone number. Parties have the option to either dial in as an audio only participant using the provided Zoom dial-in number or connect by video using the provided video link.

PLEASE TAKE FURTHER NOTICE, that opposing papers, if any, are required to be served at least seven (7) days prior to the return date of this motion.

Dated: January 30, 2025



Hui Qin
Pro Se Debtor
Huiqin41955@gmail.com



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DECLARATION OF HUI QIN

I, Hui Qin, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am the Debtor in this action. As such, I am fully familiar with the facts and circumstances stated herein. This declaration is made based upon my personal knowledge of this matter.
2. I respectfully submit this Declaration in support of the debtor's motion for an Order, pursuant to 11 U.S.C.S. §305(a), to withdraw the Chapter 7 bankruptcy petition voluntarily because the interests of creditors and the debtor would be better served by such dismissal or withdrawal.
3. I am currently out of the U.S. indefinitely. It would be very difficult for me to continue representing myself in this action. I could not find a suitable attorney to represent me in this proceeding. And I do not want to waste the judicial systems and your Honor's time to continue this case. I left all of my assets or assets which I potentially have claims in the U.S. I have nothing to hide. I have no objections to the disposal of the assets in the U.S.
4. I have evidence that SMI Holdings Group Limited, a Hongkong public company owed me \$100,000,000.00 because I personally lent money to SMI Hongkong and its subsidiaries in China in an amount of approximately ¥450,000,000.00. I also personally paid SMI Hongkong's creditors. For example, I personally paid Zhongrong International Wealth Management Limited \$47,500,000.00 in 2019.
5. The withdrawal of the Chapter 7 petition would not prejudiced the creditor, nor does the Chapter 7 filing intend to delay or defraud the creditors, and it is in the best interest of all the parties involved here.

Dated: January 30, 2025



常辉

Pro Se Debtor
Huiqin41955@gmail.com



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ORDER DISMISSING CHAPTER 7 CASE

At _____, in this district, this ____ day of _____, 2025.

The matter before this Court is the Debtor's motion to dismiss his chapter 7 bankruptcy petition. Having reviewed the motion, the Court finds that (1) jurisdiction is proper pursuant to 28 U.S.C. §§157 AND 1334; (2) venue is proper pursuant to 28 U.S.C. §§1408 AND 1409; (3) this is a core proceeding pursuant to 28 U.S.C. §157(b)(2); (4) service of the motion and proposed order was proper; and (5) good cause exists to grant the motion. Accordingly, for good cause, it is hereby:

ORDERED, that the Debtor's petition in bankruptcy is hereby dismissed.

UNITED STATES BANKRUPTCY JUDGE

